

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 22-CR-

v.

**22-CR-28**

RAYMON A. FULLER, JR.,

[18 U.S.C. §§ 1951(a), 924(c)(1)(A)(ii),  
922(g)(1), and 924(a)(2)]

Defendant.

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**INDICTMENT**

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**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about August 28, 2020, in the State and Eastern District of Wisconsin,

**RAYMON A. FULLER, JR.**

did unlawfully obstruct, delay, and affect commerce by robbery, in that the defendant did unlawfully take and obtain articles and commodities in interstate commerce, that is drugs and personal property from at least one individual by means of actual and threatened force, violence, and fear of injury to a person.

In violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 28, 2020, in the State and Eastern District of Wisconsin,

**RAYMON A. FULLER, JR.**

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence,  
namely robbery as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about November 19, 2020, in the State and Eastern District of Wisconsin,

**RAYMON A. FULLER, JR.,**

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

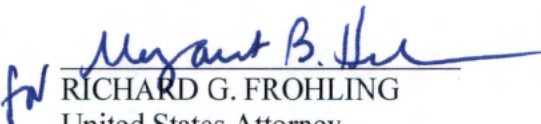
2. The firearm is more fully described as a semi-automatic Glock 19 handgun bearing serial number SOF0847.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL

FOREPERSON

Dated: 2/1/2022

  
RICHARD G. FROHLING  
United States Attorney